

COPY

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

Justin Dye

CIVIL ACTION NO. 17 C 04295-2

PLAINTIFF

VS.

Amdocs. Inc.
c/o CT Corporation System. Registered Agent
289 S. Culver Street
Lawrenceville. Georgia 30046

DEFENDANT

SUMMONS

TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

Matthew T. Wilson, Esq.
Princenthal & May, LLC
750 Hammond Drive
Building 12, Suite 200
Sandy Springs, GA 30328

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

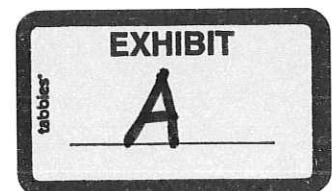
This 13 day of July 20 17.

Richard T. Alexander, Jr.
Clerk of State Court

By *Heather Carter*
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

SC-1 Rev. 2011



COPY

General Civil Case Filing Information Form (Non-Domestic)

Court

☐ Superior
☒ State
County Gwinnett

Date Filed

MM-DD-YYYY

Docket #

17 C 04295-2

Plaintiff(s)

Dye, Justin

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

No. of Plaintiffs 1

Plaintiff/Petitioner's Attorney

☐ Pro SeWilson, Matthew T.

Last First Middle I. Suffix

Bar # 558420

Defendant(s)

Amdocs, Inc.

Last First Middle I. Suffix Prefix Maiden

Taware, Samrat

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

Last First Middle I. Suffix Prefix Maiden

No. of Defendants 2

Check Primary Type (Check only ONE)

- ☐ Contract/Account
☐ Wills/Estate
☐ Real Property
☐ Dispossession/Distress
☐ Personal Property
☐ Equity
☐ Habeas Corpus
☐ Appeals, Reviews
☐ Post Judgment Garnishment, Attachment, or Other Relief
☐ Non-Domestic Contempt
☒ Tort (If tort, fill in right column)
☐ Other General Civil Specify _____

If Tort is Case Type:

(Check no more than TWO)

- ☒ Auto Accident
☐ Premises Liability
☐ Medical Malpractice
☐ Other Professional Negligence
☐ Product Liability
☐ Other Specify _____

Are Punitive Damages Pleaded? ☐ Yes ☒ No
 FILED IN OFFICE
 CLERK STATE COURT
 GWINNETT COUNTY, GA
 2017 JUL 13 PM 3:18
 RICHARD ALEXANDER, CLERK

COPY

IN THE STATE COURT OF GWINNETT COUNTY
STATE OF GEORGIA

JUSTIN DYE,

Plaintiff,

v.

AMDOCS, INC., AND
SAMRAT TAWARE,

Defendants.

CIVIL ACTION FILE

NO. **17 C 04295-2**

JURY TRIAL DEMANDED

FILED IN OFFICE
CLERK STATE COURT
GWINNETT COUNTY, GA
2017 JUL 13 PM 3:18
RICHARD ALEXANDER, CLERK

COMPLAINT

NOW COMES Plaintiff JUSTIN DYE and files this, his Complaint, in the above-styled action, showing the court as follows:

JURISDICTION AND VENUE OVER PARTIES TO THE ACTION

1.

Plaintiff voluntarily subjects himself to the jurisdiction and venue of this court by filing suit in the above-styled forum. He brings this action in his individual capacity.

2.

Defendant SAMRAT TAWARE resides outside the United States and is believed to reside in the country of India. Upon Defendant Taware's address being ascertained, he will be served in strict accordance with the Hague Convention.

3.

Defendant AMDOCS, INC., is a foreign corporation authorized to do business in the state of Georgia and may be properly served through its registered agent, CT Corporation System, 289 S. Culver St, Gwinnett County, Lawrenceville, GA 30046.

4.

This Court has subject matter jurisdiction over the matters at issue.

5.

Defendants are subject to the jurisdiction of this court.

6.

Venue for this action is proper.

7.

At approximately 1:00 pm on March 25, 2017, Plaintiff Justin Dye (hereinafter "Plaintiff") was driving his 2009 Honda Accord southbound on Georgia State Road 400.

8.

At the same time, Defendant Samrat Taware (hereinafter "Defendant Taware") was driving a Ford Fiesta rental car southbound on Georgia State Road 400.

9.

Defendant Taware, who was behind Plaintiff's vehicle, did not slow down and struck Plaintiff's vehicle at a high rate of speed.

10.

Defendant Taware followed too closely.

11.

Defendant Taware was negligent.

12.

Defendant Taware's negligence was the proximate cause of the collision between Defendant Taware's vehicle and Plaintiff's vehicle.

13.

As a direct and proximate result of Defendant's negligence, Plaintiff has suffered bodily injury and has endured physical, mental and emotional pain and suffering.

14.

Plaintiff will continue to experience physical, mental and emotional pain and suffering in the future.

15.

As a direct and proximate result of Defendant's negligence, Plaintiff has incurred medical expenses and lost wages.

16.

As a direct and proximate result of Defendant's negligence, Plaintiff will incur future medical expenses and lost wages.

17.

Plaintiff is entitled to an award of his past and future pain and suffering and mental distress and his medical expenses and lost wages incurred as a result of Defendant's negligence.

18.

At the time of the collision with Plaintiff, Defendant Taware was acting in the course and scope of his employment for Defendant Amdocs, Inc.

19.

Defendant Amdocs, Inc. is responsible for the negligent actions and/or omissions of Defendant Taware with regard to the collision described in this complaint under the doctrines of agency and/or apparent agency, *respondeat superior*, and/or vicarious liability.

WHEREFORE, Plaintiff prays for the following:

- a. That the Summons shall issue and that Defendants be served with the Summons and a copy of this Complaint as provided by law;
- b. That Plaintiff obtain judgment against Defendants for compensatory damages, including, but not limited to, all medical expenses, all lost income, and all past, present, and future physical, mental and emotional pain and suffering;
- d. That Plaintiff be granted a trial by jury as to all triable issues in this cause; and
- f. For such other and further relief as this Court deems just and equitable under all circumstances alleged and contained herein.

Respectfully submitted this 16th day of July, 2017.



Adam P. Princenthal
Georgia Bar No. 588219
Matthew T. Wilson
Georgia Bar No. 558420

PRINCENTHAL & MAY, LLC
750 Hammond Drive
Bldg. 12, Suite 200
Sandy Springs, Georgia 30328
Tel: (678) 534-1980
Fax: (404) 806-0624